



J. STEPHEN SIMMS
PRINCIPAL
JSSIMMS@SIMMSSHOWERS.COM

March 31, 2015

BY CM/ECF

Hon. Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**Re China Shipping Container Lines Co. Ltd. v.
 Big Port Service DMCC
 Case Number: 1:15-cv-02006-AT**

Dear Judge Torres:

On behalf of Big Port Service DMCC and further to the briefing before this Court, herewith is Big Port's further briefing (letter format and attachments, filed yesterday in Singapore, March 30th) to the High Court of Singapore, in connection with the High Court's imminent Order concerning arbitration.

Big Port's High Court briefing, herewith, further confirms that

The burden is on [China Shipping] to show definitively, as a matter of Singapore or New York law, that the Plaintiff's claim is legally and factually unsustainable. It has done neither. A prima facie case is one that if proved in both legal and factual assertions would result in a successful claim. This has been demonstrated with more than adequately by the Plaintiff.

This recent, continued briefing in Singapore also confirms that this Court should adjourn tomorrow's 3:00 p.m. hearing, until this Court receives and considers the High Court's decision.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Stephen Simms', is placed above the typed name.

J. Stephen Simms

Herewith: March 30, 2015 Letter Brief,
to the High Court of Singapore, and its attached/supporting authorities

Copy to Mr. Frevola, by CM/ECF